HI Engage website Privacy Policy

This page provides an outline of the way the personal data of Engage Reply website visitors is managed. This notice is also provided according to the terms of art. 13 of Italian Legislative Decree no. 196 of 30 June 2003 (hereafter referred to as Privacy Code). This notice is addressed to all who interact via the web services provided by Reply, accessed by electronic telecommunications means through the address: http://www.hiengage.eu. This notice only applies to the Engage Reply website. It does not apply to any non-Reply sites accessed via links. The notice also takes full account of *Recommendation 2/2001 of the European personal data protection authorities* of 17 May 2001. These authorities formed the Group instituted by means of art. 29 of Directive 95/46/CE. The Group's purpose in making their recommendation is to lay down minimum requisites for online collection of personal data. This consists in establishing the methods and time schedules the data processor must conform to, and the types of information data processors must provide to users accessing web pages, irrespectively of the reasons for accessing.

Data processor

When identified or identifiable users access this site, the personal data of the said users may be processed. The data processor is Reply S.p.A. (registered office: Corso Francia 110, Torino). The data is processed exclusively by Reply staff entrusted with this task. No personal data generated by the web service is transferred to third parties. The personal data provided by users are used for the sole purposes of providing requested services and performing the tasks requested. This information is transferred to third parties only when necessary in furtherance of these interests.

Types of processed data

Navigation data

IT systems and software procedures adopted for the functioning of this website, as a part of their normal functioning, collect various items of personal data. The said personal data is of the kind that is transferred as a part of the normal course of events when using the Internet (based on TCP/IP protocol).This information is not collected in order to be linked to the specific persons it refers to. However, its nature is such that, through processing and collating of data held by third parties, it may be possible to identify the navigating users.

This class of information includes the IP addresses or the domain names of the computers of users visiting the website, the addresses of requested resources (in URI, Uniform Resource Identifier format), the time of the request, the method used to forward the request to the web server, the size of the file obtained as response, the numerical code indicating the status of the response provided by the web server (successful, error, etc…) and other parameters relative to the operating system and to the user's IT environment. This data is only to be used for anonymous statistical information relative to use of the Engage Reply website and for control of correct functioning of the said website.

Please note that the said data may be used for investigations directed at identifying any persons responsible for actions classed as computer crime, which are detrimental to the website of Engage Reply or linked websites. If no such investigations are conducted, the data relative to web contacts is destroyed in a few days.

Data provided voluntarily by user

When e-mail messages are voluntarily sent to the addresses indicated in the address section of Engage Reply website, this implies the acquisition of certain items of the requesting party's personal data, including the requesting party's e-mail address (necessary for response to requests).

Cookies

The Engage Reply website uses "cookie" technology.

For information regarding the Cookies used by the Engage Reply website, how they are used and how to manage them, consult the "Cookie Policy" section of this document.

Facultative nature of personal data transfers

Apart from the above-described navigation data, users are free to provide personal information in the electronic request forms in website sections for specific requested services. Please also note that it may not be possible to process requests if this data is not provided.

Processing procedures and security measures

Personal data is processed by means of automated and non-automated equipment. It is processed only for the length of time required to fulfil the tasks for which the said data was collected. Conformity with specific security measures is ensured in order to prevent data losses, illicit or incorrect use, and unauthorized access.

Rights of individuals concerned

The individuals referred to by the personal data collected in the aforementioned sections have the right, at any time, to be informed of the existence of any such data, and to be informed of the content and origin of the said data. They have the right to check it for accuracy or to request additions or updating. They also have the right to correct such data according to the terms of art. 7 of the Privacy Code. The individuals concerned have the right to request that the said data be deleted or rendered anonymous or, when their motives are legitimate, to oppose processing of the said data. Requests of this nature are to be addressed to the e-mail address privacy@reply.it or sent to Reply S.p.A. – Corso Francia n. 110 – 10143 Torino.

Minors

Reply does not knowingly use its website to request data from minors or persons of less than 18 years of age.

Cookie Policy

The Engage Reply website (hereinafter referred to as the "Website") uses Cookies to make its services simple and effective for users visiting the portal page.

Cookies are text files, or parcels of information sent from a web server (the website www.hiengage.eu) to the user's browser, which are memorised on the computer and automatically returned to the server every time the website is accessed.

There are various types of Cookie, some used to make using the Website more efficient, others to enable certain functions. For example, Cookies can:

- memorise entered preferences;

- prevent users from having to re-enter the same information several times during their visit, for example username and password;

- analyse use of the services and contents provided by the website visited in order to optimise the browsing experience and services offered.

Types of Cookies used by the Engage Reply website

The types of Cookies used by the Engage Reply website are listed below, grouped according to their reasons for use.

Technical Cookies

This type of Cookie allows certain sections of the Website to function correctly and are essential in order to allow the user to browse the Website and use its features. There are two categories of technical cookies:

- persistent: once the browser has been closed these are not cancelled, but last until a pre-defined expiry date;

- session: these are automatically cancelled each time the browser is closed.

These Cookies are necessary for the correct visualisation of the Website and, in relation to the technical services offered, will therefore always be used and sent (unless the user modifies the settings in his or her browser). Included in this category are the persistent Cookies used to allow the user to register with the Website and access its restricted area.

The aforementioned Cookies used by the Website avoid the need to use other data processing techniques which could potentially reduce the confidentiality of the users' navigation of the website, and do not permit the acquisition of identifying personal information regarding the user.

Functionality Cookies

The Cookies in this category are used to memorise certain settings selected by the user, in order to remember their preferences during future visits.

These Cookies can have the duration of a session but they are generally persistent and sent from the "Engagereply.eu". They may also be used when providing a service not explicitly requested by, but provided to the user.

The information gathered by these cookies is anonymous and cannot track the user's behaviour on other websites.

Included in this category, for example, are Cookies used primarily to memorise the user's preferences regarding the country of origin and therefore the language in which the text of the Website is viewed.

Performance Cookies

The cookies in this category (which also include so-called "Cookie analytics") are used to gather information regarding use of the website.

The Engage Reply website uses this information to obtain anonymous statistical analyses in order to improve use of its Website and to adapt its contents to the desires of its visitors. This type of Cookie gathers information anonymously regarding the user's activity and how he or she arrived at the Website.

Analytical cookies may be sent from the Website itself (so-called "first-party" Cookies) but they are generally sent from third party domains / websites (so-called "third-party" Cookies).

Included in this category, for example, are Web Analytics, where the data gathered is limited to use of the website by the user and the number of accesses to the website, in order to manage the performance and structure of the website. These cookies are generally persistent.

The user's consent

According to regulations, the Engage Reply website is not obliged to request consent for first-party technical and analytical Cookies, as they are necessary in order to provide the services requested. They are therefore installed automatically by the Website during the user's first visit to any page of the portal.

For other types of Cookie, consent is requested via a pop-up banner: this implies active behaviour on the part of the user, meaning that the latter can give his or her consent by clicking on the "OK" button.

For all other types of Cookie the user can give his or her consent by one or more of the following means:

- via specific browser settings used to browse the pages that form the Website (see the following section);
- via modifications to the settings for the use of third party services.

Please note that certain areas or features of the Website rely on the use of Cookies, meaning that disabling Cookies using one of the solutions indicated above could prevent the user from visualising certain parts of the Website correctly or using specific features offered by the Website (for example authentication and access to the restricted area of the website).

How to manage the Cookies used by the Engage Reply website through browser configuration

Nearly all internet browsers are set up to automatically accept Cookies. The user can modify the predefined configuration (generally set to "medium" level) and disable Cookies, selecting from the form provided (generally entitled "Privacy") the highest level of protection. In all cases, the user also has the opportunity to delete individual Cookies from his or her computer by going to "Internet Options", Tools menu and selecting the "General" form and clicking the appropriate deletion button.

Below are more detailed instructions for managing Cookies on the part of the user for the more common browsers. The user can find further information at http://www.allaboutcookies.org/. To delete Cookies from the internet browser of your smartphone/tablet, you should refer to the device's user manual.

Chrome

1. Click on the (“*Settings*”) menu in the browser's toolbar next to the window for inserting the url when browsing.
2. Select “*Settings”*.
3. Click on “*Show Advanced Settings”* at the end of the list.

4. In the “*Privacy*” section click on the “*Contents settings” button*“.
5. In the “*Cookie*” section it is possible to modify the following settings regarding Cookies:
    - Allow local data to be set
    - Keep local data only until you quit your browser
    - Block sites from setting any data
    - Block third-party cookies and site data
    - Manage exceptions for certain websites
    - Delete some or all Cookies

Mozilla Firefox

1. Click on the (“*Settings*”) menu in the browser's toolbar next to the window for inserting the url when browsing.
2. Select “*Options”*
3. Select the “*Privacy” panel*
4. In the “*Tracking*” section it is possible to modify the following settings regarding Cookies:
    - Tell sites that I do not want to be tracked
5. In the “*History*” section it is possible:
    - By enabling “*Use custom settings for history*” to choose to accept third party Cookies (always, from the most visited sites or never) and to conserve them for a determined period of time (until they expire, until I close Firefox or ask me every time)
    - Remove individual stored Cookies

Internet Explorer

1. Click on the “*Tools*” button and select “*Internet Options*”
2. Click on the “*Privacy*” tab and in the “*Settings*” section, move the slider to the desired action for Cookies:
    - Block all Cookies
    - Allow all Cookies
    - Selecting which sites to allow Cookies from: move the cursor to an intermediate posistion in order neither to block nor allow all Cookies, then click on “*Sites*”, in the “*Website addres*” insert a website then press “*Block*” or “*Allow*”

Safari

1. Click on Safari, select Preferences and click on Privacy
2. In the Block Cookies section specify how Safari must accept Cookies from websites.
3. To view which websites have stored Cookies click on Details

In all cases, the user is advised to check his or her browser settings from time to time.

How to manage the Cookies via modifications to the settings when using third-party services.

The Website may contain third-party Cookies and links to other websites: third parties have their own privacy information that differs from that adopted by the Engage Reply website and which is unrelated to the latter.

Listed below are the links to the pages containing the information and specific instructions from third parties.

- Google services: https://www.google.com/intl/en/policies/technologies/cookies/
- Webtrends: http://www.webtrends.com/terms-policies/privacy/privacy-statement/

Users are advised to take careful note of the information and policies regarding the use of cookies produced by third parties and, as stated above, also in order to be aware of any modifications made to them by the various suppliers independently of Engage Reply.